

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Michael Gerard Fletcher (State Bar No. 70849) mfletcher@frandzel.com Gerrick M. Warrington (State Bar No. 294890) gwarrington@frandzel.com FRANDZEL ROBINS BLOOM & CSATO, L.C. 1000 Wilshire Boulevard, Nineteenth Floor Los Angeles, CA 90017-2427 Telephone: (323) 852-1000 Facsimile: (323) 651-2577 <input type="checkbox"/> <i>Individual appearing without attorney</i> <input checked="" type="checkbox"/> <i>Attorney for: Archway Broadway Loan SPE, LLC</i>	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION	
In re: SEATON INVESTMENTS, LLC, <i>et al.</i> , Debtors and Debtors-in-Possession. Affects: <input type="checkbox"/> All Debtors <input type="checkbox"/> Seaton Investments, LLC <input type="checkbox"/> Colyton Investments, LLC <input type="checkbox"/> Broadway Avenue Investments, LLC <input type="checkbox"/> SLA Investments, LLC <input type="checkbox"/> Negev Investments, LLC <input type="checkbox"/> Alan Gomperts <input checked="" type="checkbox"/> Daniel Halevy <input checked="" type="checkbox"/> Susan Halevy	Lead Case No. 2:24-bk-12079-VZ Jointly Administered with Case Nos.: 2:24-bk-12080-VZ; 2:24-bk-12081-VZ; 2:24-bk-12082-VZ; 2:24-bk-12091-VZ; 2:24-bk-12074-VZ; 2:24-bk-12075-VZ; and 2:24-bk-12076-VZ CHAPTER: 11
NOTICE OF MOTION AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 (with supporting declarations) (ACTION IN NONBANKRUPTCY FORUM)	
DATE: January 7, 2025 TIME: 10:30 a.m. COURTROOM: 1368	
Debtor(s). Movant: Archway Broadway Loan SPE, LLC	

1. Hearing Location:

- | | |
|---|--|
| <input checked="" type="checkbox"/> 255 East Temple Street, Los Angeles, CA 90012 | <input type="checkbox"/> 411 West Fourth Street, Santa Ana, CA 92701 |
| <input type="checkbox"/> 21041 Burbank Boulevard, Woodland Hills, CA 91367 | <input type="checkbox"/> 1415 State Street, Santa Barbara, CA 93101 |
| <input type="checkbox"/> 3420 Twelfth Street, Riverside, CA 92501 | |

2. Notice is given to the Debtor and trustee (*if any*)(Responding Parties), their attorneys (*if any*), and other interested parties that on the date and time and in the courtroom stated above, Movant will request that this court enter an order granting relief from the automatic stay as to Debtor and Debtor's bankruptcy estate on the grounds set forth in the attached Motion.
3. To file a response to the motion, you may obtain an approved court form at www.cacb.uscourts.gov/forms for use in preparing your response (optional LBR form F 4001-1.RFS.RESPONSE), or you may prepare your response using the format required by LBR 9004-1 and the Court Manual.

5420710v1 | 101415-0002

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

4. When serving a response to the motion, serve a copy of it upon the Movant's attorney (or upon Movant, if the motion was filed by an unrepresented individual) at the address set forth above.
5. If you fail to timely file and serve a written response to the motion, or fail to appear at the hearing, the court may deem such failure as consent to granting of the motion.
6. ☒ This motion is being heard on REGULAR NOTICE pursuant to LBR 9013-1(d). If you wish to oppose this motion, you must file and serve a written response to this motion no later than 14 days before the hearing and appear at the hearing.
7. ☐ This motion is being heard on SHORTENED NOTICE pursuant to LBR 9075-1(b). If you wish to oppose this motion, you must file and serve a response no later than *(date)* _____ and *(time)* _____; and, you may appear at the hearing.
- a. ☐ An application for order setting hearing on shortened notice was not required (according to the calendaring procedures of the assigned judge).
- b. ☐ An application for order setting hearing on shortened notice was filed and was granted by the court and such motion and order have been or are being served upon the Debtor and upon the trustee (if any).
- c. ☐ An application for order setting hearing on shortened notice was filed and remains pending. After the court rules on that application, you will be served with another notice or an order that specifies the date, time and place of the hearing on the attached motion and the deadline for filing and serving a written opposition to the motion.

Date: 12/17/2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.

Printed name of law firm (if applicable)

Gerrick M. Warrington

Printed name of individual Movant or attorney for Movant

/s/ Gerrick M. Warrington

Signature of individual Movant or attorney for Movant

MOTION FOR RELIEF FROM THE AUTOMATIC STAY AS TO NONBANKRUPTCY ACTION

1. **In the Nonbankruptcy Action, Movant is:**

- a. ☒ Plaintiff
- b. ☐ Defendant
- c. ☒ Other (*specify*): creditor of Decedent's Estate

2. **The Nonbankruptcy Action:** There is a pending lawsuit or administrative proceeding (Nonbankruptcy Action) involving the Debtor or the Debtor's bankruptcy estate:

- a. *Name of Nonbankruptcy Action:* In re Halevy, David ("Decedent") ("Probate Action")
- b. *Docket number:* 24STPB01963
- c. *Nonbankruptcy forum where Nonbankruptcy Action is pending:* Los Angeles County Superior Court
- d. *Causes of action or claims for relief (Claims):*

Movant's deemed-rejected creditor's claim, and an action against Defendants (defined below) on Movant's deemed-rejected creditor's claim:

1. Declaratory Relief (to determine what is property of the Decedent's Estate and what is not); 2. Breach of Guaranty (Decedent's guaranty of the Broadway Loan); 3. Breach of Guaranty (Decedent's guaranty of the Negev Loan); 4. Breach of Guaranty (Decedent's guaranty of the SLA Loan); 5. Liability of Trustee of Decedent's Revocable Trust; 6. Fraudulent Transfer; 7. Declaratory Relief re Constructive Trust and Equitable Lien; 8. Breach of Fiduciary Duty; 9. Conversion; and 10. Injunctive Relief.

See, generally, Adversary Complaint Adv. Dkt. 1 Adversary No. 2:24-ap-01241-VZ.

3. **Bankruptcy Case History:**

- a. ☒ A voluntary ☐ An involuntary petition under chapter ☐ 7 ☒ 11 ☐ 12 ☐ 13 was filed on (*date*) 03/18/2024.
- b. ☐ An order to convert this case to chapter ☐ 7 ☐ 11 ☐ 12 ☐ 13 was entered on (*date*) _____.
- c. ☐ A plan was confirmed on (*date*) _____.

4. **Grounds for Relief from Stay:** Pursuant to 11 U.S.C. § 362(d)(1), cause exists to grant Movant relief from stay to proceed with the Nonbankruptcy Action to final judgment in the nonbankruptcy forum for the following reasons:

- a. ☐ Movant seeks recovery only from applicable insurance, if any, and waives any deficiency or other claim against the Debtor or property of the Debtor's bankruptcy estate.
- b. ☒ Movant seeks recovery primarily from third parties and agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor or bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- c. ☐ Mandatory abstention applies under 28 U.S.C. § 1334(c)(2), and Movant agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor or bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- d. ☐ The Claims are nondischargeable in nature and can be most expeditiously resolved in the nonbankruptcy forum.
- e. ☒ The Claims arise under nonbankruptcy law and can be most expeditiously resolved in the nonbankruptcy forum.

- f. ☐ The bankruptcy case was filed in bad faith.
- (1) ☐ Movant is the only creditor, or one of very few creditors, listed or scheduled in the Debtor's case commencement documents.
- (2) ☐ The timing of the filing of the bankruptcy petition indicates that it was intended to delay or interfere with the Nonbankruptcy Action.
- (3) ☐ Multiple bankruptcy cases affect the Nonbankruptcy Action.
- (4) ☐ The Debtor filed only a few case commencement documents. No schedules or statement of financial affairs (or chapter 13 plan, if appropriate) has been filed.
- g. ☒ Other (*specify*):

Movant commenced an adversary proceeding against the Defendants in this Bankruptcy Case on October 14, 2024. The Adversary Proceeding is styled *Archway v. Susan Halevy, et al.* Adversary Proceeding No. 2:24-ap-01241-VZ.

On December 5, 2024, the Court decided to abstain from adjudicating the Adversary Proceeding pursuant permissive abstention under 28 U.S.C. § 1334(c)(1). The Court entered its abstention order on December 12, 2024. See Adv. Dkt. 20. The *Curtis* factors support stay relief. See Memorandum of Points and Authorities.

5. **Grounds for Annulment of Stay.** Movant took postpetition actions against the Debtor.

- a. ☐ The actions were taken before Movant knew that the bankruptcy case had been filed, and Movant would have been entitled to relief from stay to proceed with these actions.
- b. ☐ Although Movant knew the bankruptcy case was filed, Movant previously obtained relief from stay to proceed in the Nonbankruptcy Action in prior bankruptcy cases affecting the Nonbankruptcy Action as set forth in Exhibit. _____.
- c. ☒ Other (*specify*): Post-petition, Movant filed and served a creditor's claim in the Probate Action, which Defendants contend violated the stay. Movant disagrees. The creditor's claim is against the non-debtor Decedent only. Nonetheless, Movant seeks confirmation that the stay did not apply or, alternatively, annulment out of an abundance of caution.

6. **Evidence in Support of Motion: (*Important Note: declaration(s) in support of the Motion MUST be signed under penalty of perjury and attached to this motion.*)**

- a. ☒ The DECLARATION RE ACTION IN NONBANKRUPTCY FORUM on page 6.
- b. ☒ Supplemental declaration(s).
- c. ☐ The statements made by Debtor under penalty of perjury concerning Movant's claims as set forth in Debtor's case commencement documents. Authenticated copies of the relevant portions of the Debtor's case commencement documents are attached as Exhibit. _____.
- d. ☒ Other evidence (*specify*): Request for Judicial Notice

7. ☒ **An optional Memorandum of Points and Authorities is attached to this Motion.**

Movant requests the following relief:

1. Relief from the stay pursuant to 11 U.S.C. § 362(d)(1).
2. ☒ Movant may proceed under applicable nonbankruptcy law to enforce its remedies to proceed to final judgment in the nonbankruptcy forum, provided that the stay remains in effect with respect to enforcement of any judgment against the Debtor or property of the Debtor's bankruptcy estate.

3. ☒ The stay is annulled retroactively to the bankruptcy petition date. Any postpetition acts taken by Movant in the Nonbankruptcy Action shall not constitute a violation of the stay.
4. ☐ The co-debtor stay of 11 U.S.C. § 1201(a) or § 1301(a) is terminated, modified, or annulled as to the co-debtor, on the same terms and condition as to the Debtor.
5. ☒ The 14-day stay prescribed by FRBP 4001(a)(3) is waived.
6. ☐ The order is binding and effective in any bankruptcy case commenced by or against the Debtor for a period of 180 days, so that no further automatic stay shall arise in that case as to the Nonbankruptcy Action.
7. ☐ The order is binding and effective in any future bankruptcy case, no matter who the debtor may be, without further notice
8. ☒ Other relief requested:

Movant seeks an order terminating the stay to permit it to proceed (i) in the Probate Action to seek relief and obtain orders and rulings on Movant's deemed-rejected creditor's claim against the Decedent's Estate; (ii) to commence and prosecute fully its causes of action to judgment, post-judgment, and appeals, if any, against Defendants Susan Halevy ("Ms. Halevy") in her capacity as Trustee of the Halevy Family Trust Dated September 8, 2010 ("Trust"); 341 South Cannon LLC, a California limited liability company ("Cannon LLC"); Daniel Halevy, in his capacity as Personal Representative of the estate of non-debtor David Halevy, Deceased ("Mr. Halevy" and collectively, the "Defendants"); and (iii) to enforce any such judgment against the Defendants, including any non-debtors and non-bankruptcy-estate property and including Ms. and Mr. Halevy, but only in their non-individual capacities as Trustee of the Trust and/or Personal Representative of the Decedent's probate estate, not in their individual capacities and not against their property or proeprty of these jointly-administered bankruptcy estates.

Date: 12/17/2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.

Printed name of law firm (*if applicable*)

Gerrick M. Warrington

Printed name of individual Movant or attorney for Movant

/s/ Gerrick M. Warrington

Signature of individual Movant or attorney for Movant

DECLARATION RE ACTION IN NONBANKRUPTCY FORUM

I, *(name of Declarant)* Bobby Khorshidi, declare as follows:

1. I have personal knowledge of the matters set forth in this declaration and, if called upon to testify, I could and would competently testify thereto. I am over 18 years of age. I have knowledge regarding (Nonbankruptcy Action) because:

- ☐ I am the Movant.
- ☐ I am Movant's attorney of record in the Nonbankruptcy Action.
- ☒ I am employed by Movant as *(title and capacity)*: I am a director of Archway Real Estate Income Fund I REIT, LLC fka Archway Real Estate Income Fund I SPE I, LLC, a Delaware limited liability company, who is a manager of secured creditor, Archway Broadway Loan SPE, LLC, a Delaware limited liability company ("Archway" or "Movant").
- ☐ Other *(specify)*:

2. I am one of the custodians of the books, records and files of Movant as to those books, records and files that pertain to the Nonbankruptcy Action. I have personally worked on books, records and files, and as to the following facts, I know them to be true of my own knowledge or I have gained knowledge of them from the business records of Movant on behalf of Movant, which were made at or about the time of the events recorded, and which are maintained in the ordinary course of Movant's business at or near the time of the acts, conditions or events to which they relate. Any such document was prepared in the ordinary course of business of Movant by a person who had personal knowledge of the event being recorded and had or has a business duty to record accurately such event. The business records are available for inspection and copies can be submitted to the court if required.

3. In the Nonbankruptcy Action, Movant is:

- ☒ Plaintiff
- ☐ Defendant
- ☒ Other *(specify)*: creditor of Decedent's Estate

4. The Nonbankruptcy Action is pending as:

- a. *Name of Nonbankruptcy Action*: In re Halevy, David ("Decedent") ("Probate Action")
- b. *Docket number*: 24STPB01963
- c. *Nonbankruptcy court or agency where Nonbankruptcy Action is pending*: Los Angeles County Superior Court

5. **Procedural Status of Nonbankruptcy Action:**

- a. The Claims are: Movant's deemed-rejected creditor's claim, and an action against Defendants (defined below) on Movant's deemed-rejected creditor's claim: 1. Declaratory Relief (to determine what is property of the Decedent's Estate and what is not); 2. Breach of Guaranty (Decedent's guaranty of the Broadway Loan); 3. Breach of Guaranty (Decedent's guaranty of the Negev Loan); 4. Breach of Guaranty (Decedent's guaranty of the SLA Loan); 5. Liability of Trustee of Decedent's Revocable Trust; 6. Fraudulent Transfer; 7. Declaratory Relief re Constructive Trust and Equitable Lien; 8. Breach of Fiduciary Duty; 9. Conversion; and 10. Injunctive Relief.
- b. I am informed and believe that true and correct copies of the documents filed in the Nonbankruptcy Action are attached as internal Exhibit 1 to the Adversary Complaint, Adv. Dkt. 1.

c. The Nonbankruptcy Action was filed on *(date)* 02/21/2024.

d. Trial or hearing began/is scheduled to begin on *(date)* N/A.

e. The trial or hearing is estimated to require N/A days *(specify)*.

f. Other plaintiffs in the Nonbankruptcy Action are *(specify)*:

Not applicable.

g. Other defendants in the Nonbankruptcy Action are (*specify*):

Defendants Susan Halevy, aka Sue Halevy, individually ("Ms. Halevy") and in her capacity as Trustee of the Halevy Family Trust Dated September 8, 2010 ("Trust"); 341 South Cannon LLC, a California limited liability company ("Cannon LLC"); Daniel Halevy, in his capacity as Personal Representative of the estate of non-debtor David Halevy, Deceased, and not in his individual capacity ("Mr. Halevy" and collectively, the "Defendants")

5. Grounds for relief from stay:

- a. ☒ Movant seeks recovery primarily from third parties and agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor or the Debtor's bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- b. ☐ Mandatory abstention applies under 28 U.S.C. § 1334(c)(2), and Movant agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor or the Debtor's bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- c. ☐ Movant seeks recovery only from applicable insurance, if any, and waives any deficiency or other claim against the Debtor or property of the Debtor's bankruptcy estate. The insurance carrier and policy number are (*specify*):
- d. ☒ The Nonbankruptcy Action can be tried more expeditiously in the nonbankruptcy forum.
- (1) ☐ It is currently set for trial on (*date*) _____.
- (2) ☐ It is in advanced stages of discovery and Movant believes that it will be set for trial by (*date*) _____. The basis for this belief is (*specify*):
- (3) ☒ The Nonbankruptcy Action involves non-debtor parties and a single trial in the nonbankruptcy forum is the most efficient use of judicial resources.
- e. ☐ The bankruptcy case was filed in bad faith specifically to delay or interfere with the prosecution of the Nonbankruptcy Action.
- (1) ☐ Movant is the only creditor, or one of very few creditors, listed or scheduled in the Debtor's case commencement documents.
- (2) ☐ The timing of the filing of the bankruptcy petition indicates it was intended to delay or interfere with the Nonbankruptcy Action based upon the following facts (*specify*):
- (3) ☐ Multiple bankruptcy cases affecting the Property include:
- (A) Case name:
- Case number: Chapter:
- Date filed: Date discharged: Date dismissed:
- Relief from stay regarding this Nonbankruptcy Action ☐ was ☐ was not granted.

(B) Case name:

Case number:

Chapter:

Date filed:

Date discharged:

Date dismissed:

Relief from stay regarding this Nonbankruptcy Action ☐ was ☐ was not granted.

(C) Case name:

Case number:

Chapter:

Date filed:

Date discharged:

Date dismissed:

Relief from stay regarding this Nonbankruptcy Action ☐ was ☐ was not granted.

☐ See attached continuation page for information about other bankruptcy cases affecting the Nonbankruptcy Action.

☐ See attached continuation page for additional facts establishing that this case was filed in bad faith.

f. ☒ See attached continuation page for other facts justifying relief from stay.

6. ☒ Actions taken in the Nonbankruptcy Action after the bankruptcy petition was filed are specified in the attached supplemental declaration(s).

a. ☐ These actions were taken before Movant knew the bankruptcy petition had been filed, and Movant would have been entitled to relief from stay to proceed with these actions.

b. ☐ Movant knew the bankruptcy case had been filed, but Movant previously obtained relief from stay to proceed with the Nonbankruptcy Action enforcement actions in prior bankruptcy cases affecting the Property as set forth in Exhibit _____

c. ☒ For other facts justifying annulment, see ~~attached continuation page~~ Memorandum of Points and Authorities.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date Bobby Khorshidi
Printed name


Signature

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
1000 Wilshire Blvd., 19th Floor, Los Angeles, CA 90017

A true and correct copy of the foregoing following documents entitled: **NOTICE OF MOTION AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 (with supporting declarations) (ACTION IN NONBANKRUPTCY FORUM); MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF BOBBY KHORSHIDI; REQUEST FOR JUDICIAL NOTICE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 12/17/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Counsel to Party in Interest: Scott R Albrecht salbrecht@gsaattorneys.com, jackie.nguyen@sgsattorneys.com
- Counsel to KDM: Tanya Behnam tbehnam@polsinelli.com, tanyabehnam@gmail.com;ccripe@polsinelli.com;ladoctring@polsinelli.com
- Counsel to Party in Interest: Jacquelyn H Choi jacquelyn.choi@rimonlaw.com, docketingsupport@rimonlaw.com
- Counsel to Individual Debtors: Carol Chow Carol.Chow@saul.com, easter.santamaria@saul.com
- Counsel to Party in Interest: Robert F Conte robert.conte@usdoj.gov, caseview.ecf@usdoj.gov;usacac.tax@usdoj.gov
- Counsel to Individual Debtors: Ryan Coy ryan.coy@saul.com, hannah.richmond@saul.com
- Counsel to Party in Interest: Christopher Cramer secured@becket-lee.com
- Counsel to Party in Interest: Christopher Crowell ccrowell@hrhlaw.com
- Counsel to Individual Debtors: Turner Falk turner.falk@saul.com, tnfalk@recap.email
- Counsel to Archway: Michael G Fletcher mfletcher@frandzel.com, sking@frandzel.com
- Counsel to Party in Interest: Todd S. Garan ch11ecf@aldridgepite.com, TSG@ecf.inforuptcy.com;tgaran@aldridgepite.com
- Counsel to Party in Interest: Richard Girgado rgirgado@counsel.lacounty.gov
- Counsel to Party in Interest: Jacqueline L James jjames@hrhlaw.com
- Trial Counsel to U.S. Trustee: Kelly L Morrison kelly.l.morrison@usdoj.gov
- Counsel to Party in Interest: Avi Edward Muhtar amuhtar@crowandstonelaw.com
- Counsel to Archway: Bruce D Poltrock bpoltrock@frandzel.com, achase@frandzel.com
- Counsel to Individual Debtors: Zev Shechtman Zev.Shechtman@saul.com, zshechtman@ecf.inforuptcy.com;hannah.richmond@saul.com
- Counsel to Party in Interest: David B Shemano dshemano@shemanolaw.com
- Counsel to Corporate Debtors: Derrick Talerico dtalerico@wztslaw.com, maraki@wztslaw.com,sfritz@wztslaw.com,admin@wztslaw.com
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov
- Counsel to Archway: Gerrick Warrington gwarrington@frandzel.com, achase@frandzel.com
- Counsel to Party in Interest: Jennifer C Wong bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) 12/17/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 12/17/2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Hon. Vincent Zurzolo (**Overnight Mail; Early Delivery**)
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street
Bin outside of Suite 1368
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

<u>12/17/2024</u>	<u>Annette Chase</u>	<u>/s/ Annette Chase</u>
<i>Date</i>	<i>Printed Name</i>	<i>Signature</i>

2. SERVED BY UNITED STATES MAIL:

Affected Debtors:

Susan Halevy
257 South Linden Drive
Beverly Hills, CA 90212

Daniel Halevy
8561 Horner Street
Los Angeles, CA 90035

Daniel Halevy
257 S. Linden Dr.
Beverly Hills, CA 90212-3704

Other Defendants:

341 South Cannon LLC
Attn: Craig Berman, Agent for Service of Process
20750 Ventura Blvd., Ste. 201
Woodland Hills, CA 91364

Counsel to Individual Debtors:

Zev Shechtman
Carol Chow
Ryan Coy
Saul Ewing LLP
1888 Century Park East, Suite 1500
Los Angeles, CA 90067

Turner Falk
Saul Ewing LLP
1500 Market St, 38th Fl
Philadelphia, PA 19102

Counsel to Corporate Debtors:

Derrick Talerico
Weintraub Zolkin Talerico & Selth LLP
11766 Wilshire Blvd., Suite 730
Los Angeles, CA 90025

U.S. Trustee:

U.S. Trustee
United States Trustee (LA)
915 Wilshire Blvd, Suite 1850
Los Angeles, CA 90017

Kelly L Morrison
Office of the US Trustee
915 Wilshire Blvd., Ste. 1850
Los Angeles, CA 90017

Top 20 Unsecureds and Others:

Alan Gomperts
264 S. Oakhurst Drive
Beverly Hills, CA 90212

American Express
Attn: Officer or Agent
PO Box 981535
El Paso, TX 79998-1535

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

American Express National Bank (**Certified Mail**)
115 W Towne Ridge Pkwy
Sandy, UT 84070

Athas Capital Group Inc.
3990 Westerly Place
Suite 240
Newport Beach, CA 92660

Balboa Capital Corp
Attn: Officer or Agent
575 Anton Blvd
12th Floor
Costa Mesa, CA 92626

Commune Events, Inc
Attn: Officer or Agent
8561 Horner Street,
Los Angeles, CA 90035

David Halevy
257 S. Linden Avenue
Beverly Hills, CA 90212

Department of Water and Power
City of Los Angeles
Attn: Bankruptcy
P O Box 51111
Los Angeles CA 90051-5700

Harvest Commercial Capital, LLC
Harvest Small Business Finance, LLC
c/o Jacqueline L. James
Hemar, Rousso & Heald, LLP
15910 Ventura Blvd., 12th Floor
Encino, CA 91436

Harvest Small Business Finance
Attn: Officer or Agent
24422 Avenida de la Carlota
Ste 400
Laguna Hills, CA 92653-3634
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This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

KDM California LLC
c/o Polsinelli LLP
2049 Century Park E Ste 2900
Los Angeles, CA 90067

KDM California, LLC
Attn: Officer or Agent
135 San Lorenzo Avenue
Suite 600
Miami, FL 33146(41892502)

Korth Direct Mortgage Inc.
Attn: Keith E. Henrich
135 San Lorenzo Avenue, Suite 600
Coral Gables, FL 33146(42050025)

Shellpoint Mortgage Servicing
Attn: Officer or Agent
PO Box 10826
Greenville, SC 29603

Wells Fargo Bank Small Business Lending Division **(Certified Mail)**
PO Box 29482 MAC S4101-08C
Phoenix, AZ 85038

Wells Fargo Bank, National Association **(Certified Mail)**
Attn: Officer or Agent
101 N Phillips Ave
Sioux Falls, SD 57104

Brian Boyken
133 S. Palm Drive #1
Beverly Hills, CA 90212

Chase Bank
Court Orders & Levies
Mail Code LA4-7200
700 Kansas Lane
Monroe, LA 71203

JP Mortgage Chase Bank, National Association **(Certified Mail)**
Attn: Officer or Agent
1111 Polaris Pkwy
Columbus, OH 43240

Drexter Castillo
133 S. Palm Drive #2
Beverly Hills, CA 90212

First Foundation Bank
Attn: Officer or Agent
18101 Von Karman Avenue, Suite 750
Irvine, CA 92612
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This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

First Foundation Bank (**By Certified Mail**)
Attn: Erica Dorsett Chief Legal Counsel
or Officer or Agent for Service of Process
18101 Von Karman Ave
Irvine, CA 92612

Gabrielle Chavez
133 S. Palm Drive #4
Beverly Hills, CA 90212

Los Angeles County Tax Collector
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